

I think this will hurt many small operators and not contribute to the safety of flight. As a 2000+ hour pilot and a professional engineer, I would insist on seeing the statistics that support this new rule.

It is my professional belief that the commercial and instrument ratings are sufficient to insure safety if the existing rules are enforced for visibility and communications.

The other factor to be considered is the benefit to the community and the pilots that charity flights provide. It is shocking that the FAA would consider handicapping those benefits without giving more thorough justification.